

SYNERGISTIC INTERNATIONAL LLC,)
)
Plaintiff,)
)
vs.)
)
CIV. NO.: 1:14-cv-01677
MIKE COMPELL, individually and d/b/a)
GLASS DOCTOR and GLASSDOCTOR)
NORTHSHORE)
)
Defendant.)

Plaintiff Synergistic International LLC (“Plaintiff”), pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, respectfully moves the Court for an Order:

1. Directing the entry of final judgment by default in favor of Plaintiff and against Defendant Mike Compell, individually and doing business as “Glass Doctor” and “GlassDoctor Northshore” (“Defendant”), in this civil action for the legal and equitable relief demanded in the Complaint;
2. Determining the amount of Plaintiff’s monetary recovery, in the form of an award of Plaintiff’s reasonable attorneys’ fees and expenses incurred in connection with this action, as \$28,531.59, and directing the entry of judgment in favor of Plaintiff and against Defendant in that amount; and
3. Granting such other and further relief as the Court may deem just and proper.

In support of this Motion, Plaintiff relies on the following materials, either previously submitted in this action or filed contemporaneously with this Motion (as noted below):

1. Plaintiff's Complaint, filed March 11, 2014 (ECF No. 1);
2. The Return of Service, filed April 30, 2014 (ECF No. 9);
3. The Clerk's Order for Entry of Default, dated June 13, 2014, entering Defendant's default on the record (ECF No. 15);
4. The Declaration of Christopher P. Bussert, submitted contemporaneously herewith;
5. The Declaration of Zachary J. Watters, submitted contemporaneously herewith;
- and
6. Plaintiff's Brief in Support of this Motion, submitted contemporaneously herewith.

Plaintiff also has submitted, together with this Motion, a proposed Order of Final Judgment and Permanent Injunction by Default Against Defendant, as requested herein.

Respectfully submitted, this 25th day of June 2014.

/s/ Zachary J. Watters
Larry L. Saret (IL Bar No. 2459337)
Zachary J. Watters (IL Bar No. 6310675)
MICHAEL BEST & FRIEDRICH LLP
Two Prudential Plaza
180 North Stetson Avenue, Suite 2000
Chicago, IL 60601
E-mail: llsaret@michaelbest.com
zjwatters@michaelbest.com
Telephone: (312) 222-0800
Facsimile: (312) 222-0818

– and –

Christopher P. Bussert (admitted *pro hac vice*)
James W. Faris Jr. (admitted *pro hac vice*)

KILPATRICK TOWNSEND & STOCKTON LLP

1100 Peachtree Street, Suite 2800

Atlanta, GA 30309

E-mail: jfaris@ktslaw.com

cbussert@ktslaw.com

Telephone: (404) 815-6500

Facsimile: (404) 815-6555

Attorneys for Plaintiff Synergistic International LLC